



WILLIAM P. DENI, JR.  
Director

Gibbons P.C.  
One Gateway Center  
Newark, New Jersey 07102-5310  
Direct: (973) 596-4853 Fax: (973) 639-8373  
wdeni@gibbonslaw.com

April 25, 2022

**VIA ECF**

Hon. P. Kevin Castel, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Michael Todd Beauty LP v. Sony Group Corporation, et al.  
Case No. 22-cv-00607 (PKC)**

Dear Judge Castel:

This firm, along with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, represents Defendants Sony Group Corporation and Sony Corporation of America (collectively, "Defendants") in the above-referenced action. We write to respectfully request a 14-day extension of time, from April 27, 2022, to May 11, 2022, for Defendants to respond to Plaintiff's Complaint in order to provide the parties time to continue recent productive settlement discussions. As per Section 1.B. of Your Honor's individual practices, we also respectfully request that the initial conference currently scheduled for May 19, 2022, be adjourned until at least 14 days after May 11, 2022. This is Defendants' second request for an extension of their response deadline and adjournment of the initial conference. The first request was granted. (ECF No. 15.)

Plaintiff Michael Todd Beauty has indicated that Plaintiff does not intend to oppose this request and asked that we include the following statement as a summary of its position:

Michael Todd Beauty does not consent to Sony's request for a 14-day extension of time but in the interests of efficiency and unless requested to do so by the Court does not intend to file a formal opposition. Specifically, and as pled in the Complaint, Michael Todd Beauty believes that Sony's co-pending Chinese invalidity action threatens Michael Todd Beauty with irreparable harm, such that prompt adjudication of this Action is essential.

We thank the Court for its time and attention to this matter and remain available at the Court's convenience to address any questions or concerns.

Respectfully submitted,

s/ William P. Deni, Jr.  
William P. Deni, Jr.

cc: All counsel of record (via ECF)

*Time to answer  
extended to May 11,  
2022 but the  
initial conference will  
remain  
scheduled for  
May 19 at  
11:30 am  
SO ORDERED  
USDS  
4-26-22*